

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ORLANDO A. ACOSTA and : DOCKET NO. 2:17-cv-01462-JHS
EDWARD LLOYD, :
PLAINTIFFS :
V. :
DEMOCRATIC CITY COMMITTEE, :
EMILIO VAZQUEZ, CARLOS MATOS, :
ELAINE TOMLIN, JEWELL WILLIAMS, :
DWANE LILLES, SHIRLEY GREGORY, :
EL-AMOR BROWNE ALI, LESLIE :
ACOSTA, MIKE TURZAI, :
PHILADELPHIA CITY COMMISSIONERS :
& COUNTY PHILADELPHIA BOARD OF :
ELECTIONS and PENNSYLVANIA :
DEPARTMENT OF STATE - BUREAU OF :
ELECTIONS, :
DEFENDANTS :

LUCINDA LITTLE, CHERI HONKALA, : DOCKET NO. 2:17-cv-01562-JHS
THE GREEN PARTY OF PENNSYLVANIA, :
REPUBLICAN CITY COMMITTEE OF :
PHILADELPHIA and REPUBLICAN :
PARTY OF PENNSYLVANIA (a/k/a) :
REPUBLICAN STATE COMMITTEE, :
PLAINTIFFS :
V. :
EMILIO VAZQUEZ, COMMISSIONER :
ANTHONY CLARK, COMMISSIONER :
AL SCHMIDT, COMMISSIONER LISA M. :
DEELEY, PEDRO CORTES, SECRETARY :
OF THE COMMONWEALTH, DEPARTMENT :
OF STATE, BUREAU OF COMMISSIONS, :
ELECTIONS AND LEGISLATION and :
PHILADELPHIA CITY DEMOCRATIC :
COMMITTEE, :
DEFENDANTS :

MOTION OF THE PLAINTIFFS, CHERI HONKALA, THE GREEN PARTY OF
PENNSYLVANIA, REPUBLICAN CITY COMMITTEE OF PHILADELPHIA AND
LUCINDA LITTLE, FOR AN EXTENSION OF FOUR (4) DAYS
TO FILE AN AMENDED COMPLAINT

The Plaintiffs, Cheri Honkala, the Green Party of Pennsylvania, Republican City Committee of Philadelphia and Lucinda Little, by and through their counsel, Samuel C. Stretton, Esquire and Linda A. Kerns, Esquire, respectfully request this Honorable Court grant an extension of four (4) days to file an Amended Complaint for the following reasons:

1. Pursuant to the Order of the Honorable Joel S. Slomsky dated January 22, 2018, the Plaintiffs are directed to file an Amended Complaint within twenty (20) days.

2. Present counsel calculates the Plaintiffs' Amended Complaint would be due on or before Monday, February 12, 2018.

3. Although the Order is dated January 22, 2018, it was not docketed until January 23, 2018, and was not received by present counsel until January 24, 2018.

4. During that time period, present counsel, Samuel C. Stretton, Esquire, was doing the final move of his law office, involving the move of thousands of files.

5. Present counsel, Samuel C. Stretton, Esquire, had had numerous hearings and trials, and has filed a number of appellate briefs.

6. Present counsel, Samuel C. Stretton, Esquire, is a sole practitioner and needs an additional four days, until Friday, February 16, 2018, to file the Amended Complaint on behalf of the Plaintiffs.

WHEREFORE, the Plaintiffs, Cheri Honkala, the Green Party of Pennsylvania, Republican City Committee of Philadelphia and Lucinda Little, by and through their counsel, Samuel C. Stretton, Esquire and Linda A. Kerns, Esquire, respectfully request this Honorable Court grant an extension of four (4) days to file an Amended Complaint for the reasons above stated.

Respectfully submitted,

s/Samuel C. Stretton

Samuel C. Stretton, Esquire
Attorney for Plaintiffs, Cheri
Honkala and the Green Party of
Pennsylvania
103 South High Street
P.O. Box 3231
West Chester, PA 19381-3231
(610) 696-4243
Attorney I.D. No. 18491

s/Linda A. Kerns, Esquire

Linda A. Kerns, Esquire
Attorney for Plaintiffs, Republican
City Committee of Philadelphia and
Lucinda Little
1420 Locust Street, Suite 200
Philadelphia, PA 19102
(215) 731-1400
linda@lindakernslaw.com
Attorney I.D. No. 84495

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DEFENDANTS :

CERTIFICATE OF SERVICE

I hereby certify I am this date serving a copy of the Motion of the Plaintiffs, Cheri Honkala, the Green Party of Pennsylvania, Republican City Committee of Philadelphia and Lucinda Little, for an Extension of Time to File the Amended Complaint in the captioned matter upon the following persons in the manner indicated below.

Service by First Class Mail addressed as follows:

1. Linda A. Kerns, Esquire
1420 Locust Street, Suite 200
Philadelphia, PA 19102
(215) 731-1400
linda@lindakernslaw.com
Attorney I.D. No. 84495
Counsel for Plaintiffs, Republican City Committee of
Philadelphia and Lucinda Little
2. Joel L. Frank, Esquire
Lamb McErlane, PC
P.O. Box 565
West Chester, PA 19381-0565
(610) 430-8000
jfrank@lambmcerlane.com
Attorney I.D. No. 46601
Counsel for Plaintiff, Republican State Committee
3. Timothy E. Gates, Chief Counsel
Pennsylvania Department of State
306 North Office Building
Harrisburg, PA 17120
(717) 783-0736
tgates@pa.gov
Counsel for Defendants Pedro Cortes, Secretary of the
Commonwealth and Department of State Bureau of
Commissions, Elections and Legislation

4. Kathleen M. Kotula, Deputy Chief Counsel
Pennsylvania Department of State
306 North Office Building
Harrisburg, PA 17120
(717) 783-0736
kkotula@pa.gov
Counsel for Defendants Pedro Cortes, Secretary of the
Commonwealth and Department of State Bureau of
Commissions, Elections and Legislation
5. Benjamin H. Field, Esquire
City of Philadelphia Law Department
1515 Arch Street, 15th Floor
Philadelphia, PA 19102
(215) 683-5024
Benjamin.field@phila.gov
Counsel for Commissioner Anthony Clark, Commissioner
Al Schmidt and Commissioner Lisa M. Deeley
6. Adam C. Bonin, Esquire
The Law office of Adam C. Bonin
30 South 15th Street, 15th Floor
Philadelphia, PA 19102
(215) 864-8002
adam@boninlaw.com
Counsel for State Representative Emilio Vazquez
7. Marni Jo Snyder, Esquire
Law Offices of M.J. Snyder, LLC
Land Title Building
100 South Broad Street
Suite 1910
Philadelphia, PA 19110
(215) 515-3360
marni@snyderlawyer.com
8. Orlando A. Acosta
5355 Belfield Avenue
Philadelphia, PA 19144
Orlandoacosta979@gmail.com
Pro Se Plaintiff

9. Matthew P. Weisberg, Esquire
Weisberg Law PC
7 South Morton Avenue
Morton, PA 19070
(610) 690-0801
mweisberg@weisberglawoffices.com
Counsel for Plaintiff, Edward Lloyd
10. Anthony George Kyriakakis, Esquire
Dilworth Paxson, LLP
1500 Market Street, Suite 3500 E
Philadelphia, PA 19102
(215) 575-7149
akyriakakis@dilworthlaw.com
Counsel for Defendants, Carlos Matos, Elaine Tomlin,
Jewell Williams, Dwane Lilles, Shirley Gregory and
El-Amor Browne Ali
11. Karl S. Myers, Esquire
Stradley, Ronon, Stevens & Young, LLP
2600 One Commerce Square
Philadelphia, PA 19103-7098
(215) 564-8120
kmyers@stradley.com
Counsel for Defendants, Leslie Acosta and Mike Turzai

February 7, 2018

Date

Respectfully submitted,

s/Samuel C. Stretton

Samuel C. Stretton, Esquire
Attorney for Plaintiffs, Cheri
Honkala and the Green Party of PA
103 South High Street, P.O. Box 3231
West Chester, PA 19381-3231
(610) 696-4243
Attorney I.D. No. 18491

s/Linda A. Kerns, Esquire

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Attorney for Plaintiffs, Republican
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